

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION

UNITED STATES OF AMERICA,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	4:22-CR-108
	§	
HECTOR FLORES,	§	
<i>Defendant.</i>	§	

Defendant's Proposed Voir Dire

1. Many of you are parents and will hear evidence about Mr. Flores's actions that may differ from what you would have done as a parent. Can you set aside your expectations for model parentage and strictly apply the evidence to the elements the government has to prove in this case?
2. This is a criminal charge that bears on the parent/child relationship, many people will be tempted to consider this charge in light of Mr. Flores's future relationship with his daughter. Can you follow the Court's instructions not to discuss or consider how this will affect his legal relationship with his daughter and focus solely on the elements the government has to prove?
3. This case involves a charge that Mr. Flores deprived his daughter of food leading to imminent bodily injury. You will possibly hear about other behaviors he took about which you disapprove. Can you set aside your disapproval and evaluate the evidence solely in relationship to whether the government has proven the allegation alleged.

4. After listening to the evidence and the law and forming your opinion, will you hold fast to that opinion regardless of pressures within the jury deliberation to alter your opinions in order to come to an agreement?
 - a. Will you fight to hold fast to your conscious and opinions regardless of the opinions of the other jurors?
5. You will be asked to determine whether Mr. Flores ought to have been aware of a substantial or unjustifiable risk. You may also hear evidence that a medical condition altered his perception of the risk. Are you able to evaluate this case from the standpoint of what Flores would have been reasonably expected to perceive, disregarding what you would have perceived?

Respectfully submitted,

/S/ Shane O'Neal
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

AUSA Scott Greenbaum

/s/ Shane O'Neal
SHANE O'NEAL
Attorney for Defendant